

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Indianapolis Division**

PATRICK COLLINS, INC.,)	Case No.: 1:12-cv-00844-TWP-MJD
)	
Plaintiff,)	
)	
v.)	
)	
MATTHEW OLDLAND,)	
DERRICK LUND, RADLEY HADDAD,)	
and JOHN DOES 5, 6, 7, 9, 10, 11)	
and 12,)	
)	
Defendants.)	

**DEFENDANT'S OPPOSITION TO PLAINTIFF'S MOTION FOR
FEES PURSUANT TO 28 U.S.C. § 1927 [CM/ECF 119]**

Defendant, Derrick Lund, hereby opposes Plaintiffs Motion For Fees Pursuant to 28 U.S.C. §1927 (Dkt. 119).

Plaintiff Motion should be denied because it was filed in violation of Local Rule 7-1(g)(1)(a), which requires any such fee motion be accompanied by “a statement showing that the attorney made reasonable efforts to confer with opposing counsel and resolve the matters raised in the motion.” There was no such statement because Plaintiff’s counsel has made no effort whatsoever to contact the undersigned about the issues raised in his motion.

Nonetheless, Defendant hereby waives its claim to “fees incurred that are common to multiple defendants.” Defendant is separately filing an updated accounting of actual fees incurred without any of the allocated fees for work common to multiple clients. The total amount of such fees is \$14,094.97.

Respectfully submitted,

By: s/John M. Bradshaw
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing is being filed electronically, and notice hereof will automatically be sent to all counsel of record that participate in electronic filing, by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: s/John M. Bradshaw
John M. Bradshaw